

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 13 & 1198

**NOTICE OF FILING OF PROPOSED ORDER PURSUANT TO SECTION 363
AND 365 OF THE BANKRUPTCY CODE AUTHORIZING THE
DEBTORS-IN-POSSESSION TO TERMINATE OR ASSUME, ASSIGN AND SELL
CERTAIN NON-RESIDENTIAL REAL PROPERTY**

PLEASE TAKE FURTHER NOTICE that, on September 9, 2024, the debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Procedures to Sell Certain Leases, (II) Approving the Sale of Certain Leases, and (III) Granting Related Relief* (the “**Lease Sale Procedures Motion**”) (D.I. 13).

PLEASE TAKE FURTHER NOTICE that, on November 20, 2024, the Court entered the *Fourth Interim Order (I) Establishing Procedures to Sell Certain Leases, (II) Approving the Sale of Certain Leases and (III) Granting Related Relief* (the “**Fourth Interim Lease Sale Procedures Order**”) (D.I. 1198).

PLEASE TAKE FURTHER NOTICE that, on December 4, 2024, pursuant to the Fourth Interim Lease Sale Procedures Order, the Debtors conducted a virtual auction for certain of the Debtors’ unexpired real property leases (the “**Lease Assets**”).

PLEASE TAKE FURTHER NOTICE that, on December 5, 2024, the Debtors filed the *Fourth Notice of Successful and Backup Bidder with Respect to the Auction of Certain of the Debtors’ Lease Assets and Assumption and Assignment of Certain Unexpired Leases* (the “**Post-Auction Notice**”) (D.I. 1312), announcing the successful bidders for the Lease Assets.

PLEASE TAKE FURTHER NOTICE that, as previewed in the Post-Auction Notice, a hearing to consider approval of the sale, assumption and assignment, termination, or

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

other disposition of the Lease Assets to the Successful Bidders at the Lease Auction, will be held before the Honorable J. Kate Stickles, at the Court, 824 Market Street, 5th Floor, Courtroom 6, Wilmington, Delaware 19801 on **December 19, 2024 at 1:00 p.m. (prevailing Eastern Time)** (the “**Lease Sale Hearing**”).

PLEASE TAKE FURTHER NOTICE that, at the Lease Sale Hearing, the Debtors will seek approval of the assumption and assignment, or termination, certain Lease Assets pursuant to an order, substantially in the form attached hereto as **Exhibit 1** (the “**Fourth Proposed Lease Sale Order**”).

Dated: December 18, 2024
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP
/s/ Sophie Rogers Churchill

Robert J. Dehney, Sr. (No. 3578)
Andrew R. Remming (No. 5120)
Daniel B. Butz (No. 4227)
Tamara K. Mann (No. 5643)
Sophie Rogers Churchill (No. 6905)
1201 N. Market Street, 16th Floor
Wilmington, DE 19801
Tel: (302) 658-9200
rdehney@morrisnichols.com
aremming@morrisnichols.com
dbutz@morrisnichols.com
tmann@morrisnichols.com
srchurchill@morrisnichols.com

-and-

DAVIS POLK & WARDWELL LLP
Brian M. Resnick (admitted *pro hac vice*)
Adam L. Shpeen (admitted *pro hac vice*)
Stephen D. Piraino (admitted *pro hac vice*)
Jonah A. Peppiatt (admitted *pro hac vice*)
Ethan Stern (admitted *pro hac vice*)
450 Lexington Avenue
New York, NY 10017
Tel.: (212) 450-4000
brian.resnick@davispolk.com
adam.shpeen@davispolk.com
stephen.piraino@davispolk.com
jonah.peppiatt@davispolk.com
ethan.stern@davispolk.com

Counsel to the Debtors and Debtors in Possession